

STEPHANIE M. HINDS  
 United States Attorney  
 MATHEW W. PILE  
 Associate General Counsel  
 Office of Program Litigation, Office 7  
 FREDERICK FRIPPS  
 Special Assistant United States Attorney  
 Office of Program Litigation, Office 7  
 Office of the General Counsel  
 Social Security Administration  
 6401 Security Boulevard  
 Baltimore, MD 21235  
 Frederick.fripps@ssa.gov  
 Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANGELA RELITA WILLIAMS,  
  
 Plaintiff,  
  
 vs.  
  
 MARTIN O'MALLEY,  
 Commissioner of Social Security,  
  
 Defendant.

) CIVIL NO. 5:24-CV-00404-PCP  
 )  
 ) STIPULATION TO VOLUNTARY  
 ) REMAND PURSUANT TO 42 U.S.C.  
 ) SECTION 405(g) SENTENCE FOUR  
 ) AND TO ENTRY OF JUDGMENT;  
 ) ~~PROPOSED~~ ORDER  
 )  
 )  
 )  
 )  
 )  
 )

The parties, acting through their respective counsel, hereby stipulate that the above-captioned case be reversed and remanded to the Commissioner of Social Security for another hearing. The Commissioner will direct the Administrative Law Judge to give further consideration to the opinion evidence and evaluate it in accordance with the regulations, further evaluate the residual functional capacity consistent with the updated evaluation of the evidence, and if necessary by the expanded record, obtain supplemental vocational expert testimony to determine if jobs exist in significant numbers in the national economy. The ALJ shall take any necessary action to complete the administrative record

1 and the sequential evaluation, and issue a new decision. Plaintiff shall have the opportunity to submit  
2 new evidence.

3 The parties further ask the Court to specify in its order that the case is being remanded pursuant  
4 to sentence four of § 405(g), and to direct the Clerk to enter judgment in accordance with Fed. R. Civ. P.  
5 58, consistent with the Supreme Court's decision in *Shalala v. Schaefer*, 509 U.S. 292, 296 302  
6 (1993). The parties agree that reasonable attorney fees, expenses, and costs may be awarded under the  
7 Equal Access to Justice Act, 28 U.S.C. §§ 2412 and 1920, upon proper request to the Court.  
8

9  
10 Dated: June 17, 2024

11 By: /s/ Francesco Benavides  
12 (\*as authorized via email)  
13 FRANCESCO BENAVIDES  
14 Attorney for Plaintiff

15 Dated: June 17, 2024


16 STEPHANIE HINDS  
17 United States Attorney  
18 MATHEW W. PILE  
19 Associate General Counsel  
20 Office of Program Litigation

21 By: /s/ Frederick Fripps  
22 FREDERICK FRIPPS  
23 Special Assistant U.S. Attorney  
24 Attorneys for Defendant

25 ORDER

26 Pursuant to stipulation, IT IS SO ORDERED.

27 DATE: June 18, 2024

28   
THE HONORABLE P. CASEY PITTS  
United States District Judge